

BRYAN CAVE LLP
560 MISSION STREET, 25TH FLOOR
SAN FRANCISCO, CA 94105

BRYAN CAVE LLP

Daniel T. Rockey, California Bar No. 178264
Bahareh Mostajelean, California Bar No. 258903
John C. Hedger, California Bar No. 230814
560 Mission Street, 25th Floor
San Francisco, CA 94105
Telephone: (415) 675-3400
Facsimile: (415) 675-3434
Email: daniel.rockey@bryancave.com
bahareh.mostajelean@bryancave.com
hedgerj@bryancave.com

Attorneys for Defendants
JPMORGAN CHASE BANK, N.A (as acquirer of certain assets from WASHINGTON MUTUAL
BANK, FA); and CALIFORNIA RECONVEYANCE CO.

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION**

JOSE BARRIONUEVO AND FLOR
BARRIONEUVU individuals,

Plaintiffs,

vs.

CHASE BANK, N.A. Successor In Interest to
WASHINGTON MUTUAL BANK, FA,
LASALLE BANK NATIONAL ASSOCIATION
as Trustee for WMALT SERIES 2006-AR4 Trust;
CALIFORNIA RECONVEYANCE
CORPORATION; MORTGAGE
ELECTRONIC REGISTRATION SYSTEM, aka
“MERS” and DOES 1 THROUGH 100,
INCLUSIVE

Defendants.

Case No.: 3:12-CV-0572 EMC

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
SCHEDULING ORDER**

Complaint Filed: 12/06/2011
First Amended Complaint Filed: 4/19/2012
Trial Date: 8/26/13

1 Plaintiffs Jose and Flor Barrionuevo (“Plaintiffs”) and defendant JPMorgan Chase Bank,
2 N.A., for itself and as an acquirer of certain assets and liabilities of Washington Mutual from the
3 Federal Deposit Insurance Corporation, as receiver for Washington Mutual Bank (“Defendant”),
4 by and through their counsels of record, hereby submit this Joint Stipulation and Proposed Order
5 regarding the scheduling order.

6 **JOINT STIPULATION**

7 Whereas, on November 5, 2012, the court set a trial date of August 26, 2012 and ordered a
8 schedule concurrent with that date;

9 Whereas, the scheduling order requires all dispositive motions to be heard no later than
10 June 6, 2013;

11 Whereas, such motions must consequently be filed no later than May 2, 2013;

12 Whereas, the deadline to conduct expert discovery is April 26, 2013;

13 Whereas, the parties agreed to have Defendant take the deposition of Plaintiffs’ expert on
14 April 26, 2013;

15 Whereas, Plaintiffs’ counsel is having cataract surgery on April 23, 2013 and has been
16 advised by his doctor that he cannot fly on April 26, 2013 and most likely not until May 5, 2013;

17 Whereas, the parties are agreed that Defendant should be allowed to depose Plaintiffs’ expert
18 and file a Rule 56 motion thereafter;

19 Whereas, the parties are agreed that, given current circumstances, there is insufficient time
20 for Defendant to do so;

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1 IT IS THEREFORE STIPULATED BETWEEN THE PARTIES that they recommend that
 2 the court's order of November 5, 2012 be amended and a new order be issued setting a deadline of
 3 June 27, 2013 for the hearing of dispositive motions (which requires such a motion to be filed no later
 4 than May 30, 2013).

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 6 Dated: April 17, 2013

Respectfully submitted,

7 **Michael Yesk, Attorney at Law**

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 9 By: /s/ Michael Yesk
 10 Michael Yesk
 11 Attorney for Plaintiffs

12 Dated: April 17, 2013

Respectfully submitted,

13 **BRYAN CAVE LLP**

14
 15 By: /s/ John C. Hedger
 16 John C. Hedger
 17 Attorneys for Defendants
 18 JPMORGAN CHASE BANK, N.A., for itself and as
 19 an acquirer of certain assets and liabilities of
 20 Washington Mutual from the Federal Deposit
 Insurance Corporation, as receiver for Washington
 Mutual Bank

21 **ATTESTATION PURSUANT TO GENERAL ORDER 45**

22 I, John C. Hedger, attest that concurrence in the filing of this document has been obtained
 23 from each of the signatories. I declare under penalty of perjury under the laws of the United States of
 24 America that the foregoing is true and correct. Executed on April 17, 2013, at San Francisco,
 25 California.

26
 27 /s/ John C. Hedger
 28 John C. Hedger

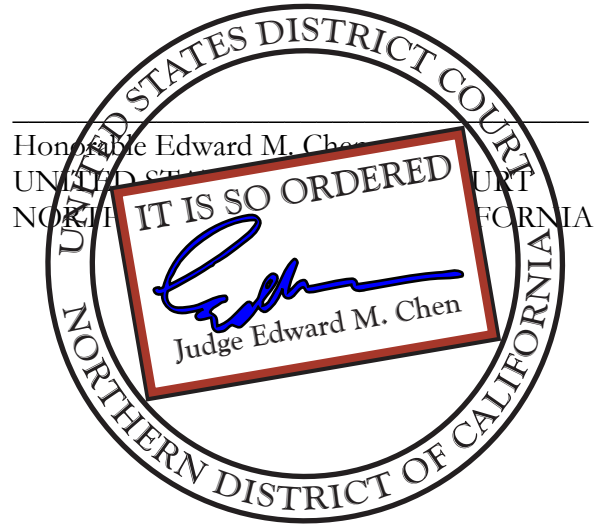
[PROPOSED] ORDER REGARDING SCHEDULING ORDER

Having reviewed the stipulation of the parties and the status of the pleadings, the recommendations of the stipulation are adopted as an order of the court as follows:

1. The scheduling order of November 5, 2012 is amended to allow the hearing of dispositive motions no later than June 27, 2013.

IT IS SO ORDERED.

DATED: 4/19, 2013



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